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AMATEUR RADIO COUNCIL OF ARIZONA

FREQUENCY COORDINATION COMMITTEE
c/o RALPH S. TURK, CHAIRMAN
P. O. BOX 5188
TUCSON ARIZONA 85703

June 13,1994

In the matter of:)
)
Allocation of Spectrum Below) ET Docket No. 94-32
5 Ghz Transferred from)
Federal Government Use)

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NOTICE OF INQUIRY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington D.C. 20554

Re: Reallocation from government service to non-government service of spectrum shared with the Amateur Radio Service

Dear Mr. Caton:

The "AMATEUR RADIO COUNCIL of ARIZONA" , A.R.C.A., is a "not for Profit Corporation" that represents the Amateur Radio Clubs in Arizona. We are composed of 40 clubs from all areas of the state. Through our member clubs, we represent well over 10,000 amateur radio operators.

One of the permanent standing committees of "ARCA" is the Frequency Coordination Committee. It is the purpose of the Frequency Coordination Committee to facilitate the coordination of repeaters, remote base, link and digital communications for over 600 repeater owners and 10, 000 plus users. In addition to coordination matters the Frequency Coordination Committee is tasked with representing the repeater owners in matters affecting their operations.

A.R.C.A. will restrict its comments to the 2300-2450 Mhz band only.

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List A B C D E

1. In general the NTIA is to be commended for its effort in complying with the requirements of the "Omnibus Budget Reconciliation Act of 1993 " (Reconciliation Act) with the following exceptions as they pertain to Amateur Radio use .
The Reconciliation Act in part stated that if frequencies are to be transferred that it (the transfer) will not result in cost or loss of service that is excessive. It also directed the Commerce Department to consider the effect reallocation will have on the use of the spectrum by amateur operators and to avoid excessive disruption of the use of Federal Government frequencies by amateur radio licensees.

2. To date, to our knowledge, neither the NTIA or any other government agency has contacted any coordination body of amateur radio or the commentors' of the original NTIA proposal. We, as well as many other coordination bodies, have adopted the "SCRRBA"2300-2450 Mhz band plan for use with in their coordination areas. (Copy attached). Due to the growing congestion in the lower UHF frequencies, we have, been developing and encouraging the use of the 2300-2450 Mhz band for expansion of existing link systems and the development of new ones. Removing any part of the band will affect the accommodation of some communications.
The NTIA did NOT take in to consideration our current uses or any of our proposed uses.

3. The following is in response to Item 9 titled Inquiry.

A. The 2300-2450 Mhz spectrum does NOT provide potential for economic growth because it is already heavily used for part 15 licenses and ISM products. The current assignments for this band should remain unchanged. Amateur Radio is better suited to work around interference caused by Part 15 and ISM devices than the commercial world.

B. The amateur radio community is well suited to work with any government agency in sharing / protecting specific frequencies. We have proven that with our current sharing of this band and other bands where we share with the government. (ie 420-450 Mhz). Our operations are very easy to identify since we use government issued call signs during all our transmissions.

C. The proposed reallocation will cause massive disruption of the of Amateur Radio service by limiting the ability of the Amateur service to grow. The 420-450 Mhz band, which is the nearest common frequency band is full. There is little room for future growth especially in large metro areas. Compared to the original allocation, the granting of 2 Mhz at 2400-2402 Mhz in both a insult and a joke. Please look at the band plan attached.

D. & E. Amateurs are willing and able to share with anyone if we operate with the same ground rules. Our experience with sharing government frequencies is positive. We can not say the same about sharing with commercial operators.

F. Read the comments to the NTIA from the public safety community. They support Amateur radio.

G. With its Part 15 and ISM and microwave oven usage , the 2300-2450Mhz band is the WRONG band to even consider for interference free radio spectrum.

H. It would be advantageous to not take the 2300-2310 Mhz band from the Amateur service.

CONCLUSIONS

The Amateur radio service has already lost a considerable portion of the 2300-2450MHz band (2310-2390) in recent years. Any further reductions in this band would have a considerable negative impact on the existing and future use by the amateur radio service

The FCC may wish to consider making the Amateur service the primary service in the 2300-2310 and 2390-2410 Mhz bands. This change would accomplish the public benefit of preserving a valuable national resource and leaving it in the hands of citizens, an idea not far removed from the reasoning for the existence of our national parks and monuments. Secondly, it would enhance the (or at least not diminish, as other proposals) the ability of unpaid, volunteer amateur radio operators to provide public and emergency service to our national, state and local governments and citizenry.

Respectfully submitted

Ralph S. Turk

Ralph S. Turk, Chairman
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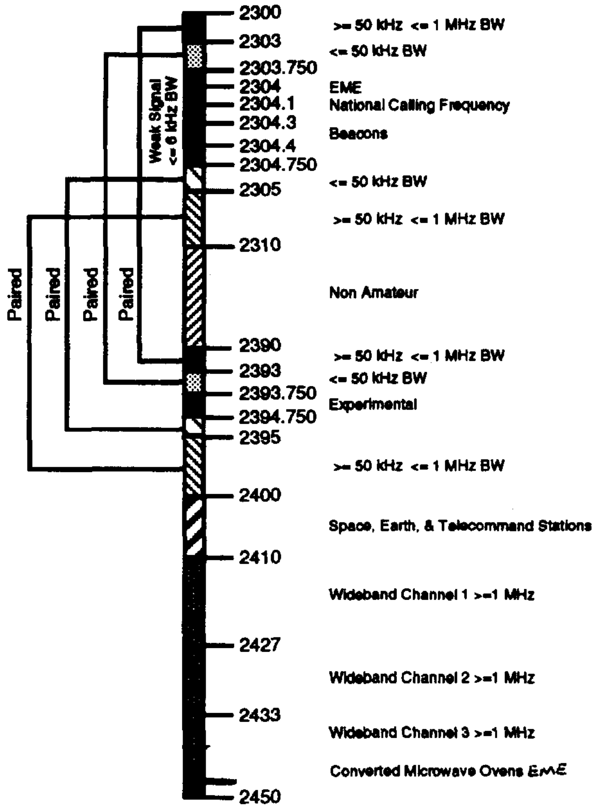
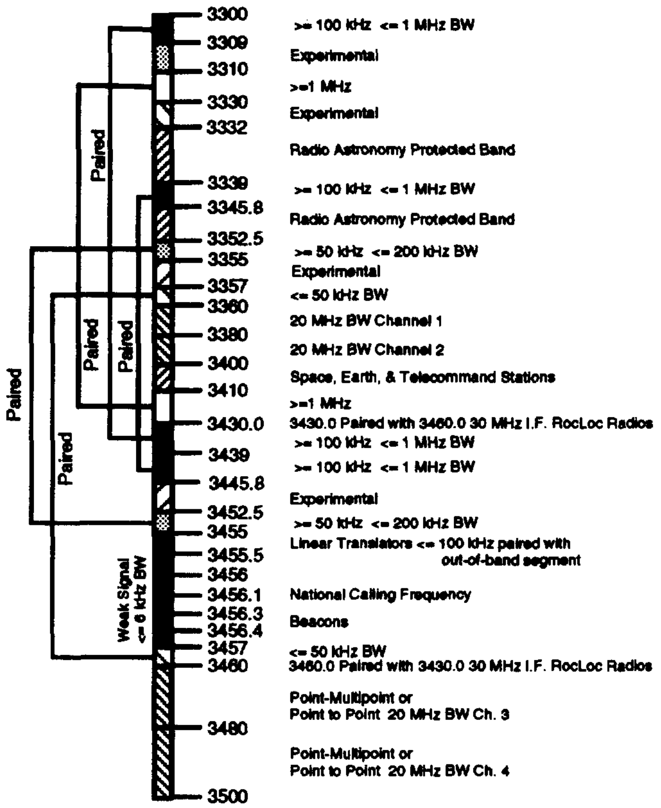
FREQUENCY COORDINATION COMMITTEE
P.O. Box 5188
Tucson, Arizona 85703

SCRRBA

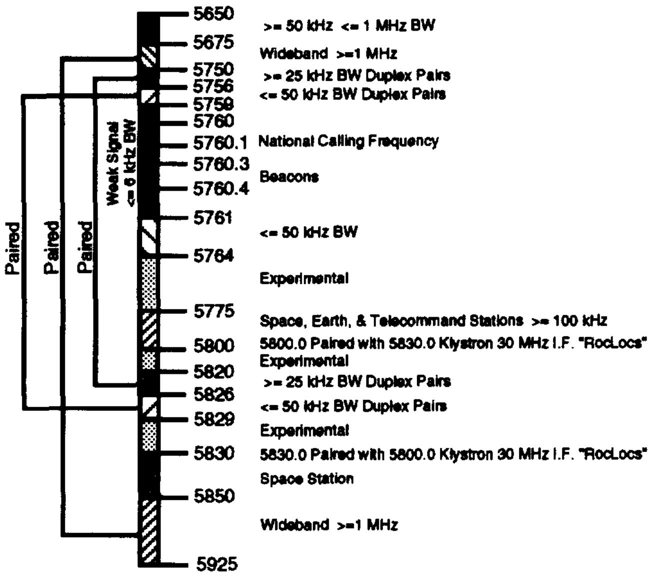
Southern California Repeater and
Remote Base Association
P.O. Box 5967
Pasadena, California 91117



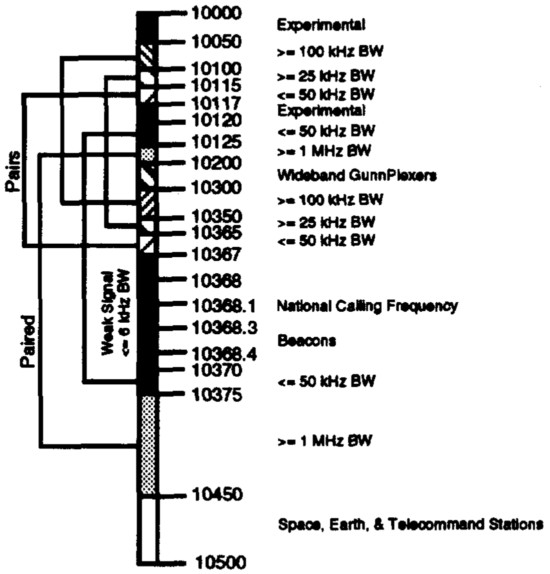
2304 Band Plan



3456 Band Plan


5650
5675
5750
5756
5759
5760
5760.1
5760.3
5760.4
5761
5764
5775
5800
5820
5826
5829
5830
5850
5925
>= 50 kHz <= 1 MHz BW
Wideband >=1 MHz
>= 25 kHz BW Duplex Pairs
<= 50 kHz BW Duplex Pairs
National Calling Frequency
Beacons
<= 50 kHz BW
Experimental
Space, Earth, & Telecommand Stations >= 100 kHz
5800.0 Paired with 5830.0 Klystron 30 MHz I.F. "RocLocs"
Experimental
>= 25 kHz BW Duplex Pairs
<= 50 kHz BW Duplex Pairs
Experimental
5830.0 Paired with 5800.0 Klystron 30 MHz I.F. "RocLocs"
Space Station
Wideband >=1 MHz
Weak Signal <= 6 kHz BW
Paired
Paired
Paired

5760 Band Plan



10368 Band Plan

SCRRBA Microwave Band Plans
Adopted 09-26-1992

BW=Occupied Bandwidth